BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

SECOND SET OF INTERROGATORIES DIRECTED TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD (UPS/USPS-T1-8)

(September 12, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory directed to United States Postal Service witness Pafford (UPS/USPS-T1-8).

Respectfully submitted,

John E. McKeever Albert P. Parker Stephanie Richman

Attorneys for United Parcel Service

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Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD

UPS/USPS-T1-8. (a) Please confirm that the Priority Mail Processing Center ("PMPC") contract was not in effect at any time during the base year in this proceeding.

(b) Please confirm that with respect to the base year in this proceeding, none of the Postal Service's sampling systems would contain data taken from or that relates to operations conducted under the PMPC contract.

(c) Will PMPC facilities be included in the Postal Service's sampling systems once those facilities are operating?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Álbert P. Parker

Dated: September 12, 1997

Philadelphia, Pa.